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Attorneys for Defendants Zeplin Global Group, LLC	
Javier Lujan, and Michael Zuccarello	
UNITED STATES DISTRICT COURT	
DISTRICT OF NEVADA	
JOSHCO TECH, LLC, a Nevada limited liability company,) Case No.: 2:20-cv-00428-APG-NJK
Dlointiff) CTIPLY ATYON AND ODDER FOR
Tranitiri,) STIPULATION AND ORDER FOR EXTENSION OF TIME TO
V.	ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT
MJJ&L HOLDING, LLC; ZEPLIN GLOBAL)) (First Request)
GROUP, LLC; JAVIER LUJAN; and MICHAEL ZUCCARELLO,) (First Request)
Defendants.	,
	_)
Pursuant to Federal Rule of Civil Procedur	re 6(b)(1) and Local Rule IA 6-1, Plaintiff, b
and through its counsel of record, and Defendant	s, by and through their respective counsel of
	Nevada Bar No. 6231 mark@borgheselegal.com BORGHESE LEGAL, LTD. 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 Tel. (702) 382-0200 Fax (702) 382-0212 Attorneys for Defendants Zeplin Global Group, LLC, Javier Lujan, and Michael Zuccarello UNITED STATES DI DISTRICT OF JOSHCO TECH, LLC, a Nevada limited liability company, Plaintiff, v. MJJ&L HOLDING, LLC; ZEPLIN GLOBAL GROUP, LLC; JAVIER LUJAN; and MICHAEL ZUCCARELLO, Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiff, by and through its counsel of record, and Defendants, by and through their respective counsel of record specially appearing and without conceding personal jurisdiction or waiving any defenses, hereby agree and stipulate for an extension of time for all Defendants to file and serve their answers or other responses to the Complaint. The first defendant was served on March 7, 2020 with a current response deadline of March 28, 2020. The Parties request that that all Defendants shall have up to and including **April 17, 2020** to answer or otherwise respond to the Complaint. This is the first request by the parties for such an extension.

This Stipulation is made for good cause and not for purposes of delay. On or about March 13, 2020 Borghese Legal, Ltd. was retained by Defendants Zeplin Global Group, LLC,

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1	Javier Lujan, and Michael Zuccarello in connection with the above-captioned case. On or abou	
2	March 14, 2020, Gile Law Group was retained by defendant MJJ&L Holding, LLC in	
3	connection with the above-captioned case. Good cause for this request exists because counsel	
4	have not yet had an opportunity to consult with Defendants regarding the allegations in the	
5	Complaint or any defenses that Defendants may have. This Stipulation shall not be construed as	
6	a waiver of any rights belonging to any of the parties hereto.	
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8	DATED: March 18, 2020.	
9	IT IS SO AGREED AND STIPULATED:	
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11	BORGHESE LEGAL, LTD.	LEWIS ROCA ROTHGERBER CHRISTIE LLP
12 13 14 15 16 17 18 19 20	By: /s/ Mark Borghese Mark Borghese, Esq. 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145 Attorneys for Defendants Zeplin Global Group, LLC, Javier Lujan, and Michael Zuccarello GILE LAW GROUP By: /s/ Ryan Gile Ryan Gile, Esq. 1180 N. Town Center Drive, Suite 100 Las Vegas, NV 89144 Attorneys for Defendant MJJ&L Holding, LLC	By: /s/ Meng Zhong Meng Zhong, Esq. Brian D. Blakley, Esq. 3993 Howard Hughes Pkwy, Suite 600 Las Vegas, NV 89169-5996 PEREZ VAUGHN & FEASBY, INC. Jeffrey A. Feasby, Esq. 600 B Street, Suite 2100 San Diego, CA 92101 Attorneys for Plaintiff
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22		IT IS SO ORDERED:
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24		UNITED STATES MAGISTRATE JUDGE
25		DATED: March 19, 2020
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BORGHESE LEGAL, LTD. 10161 PARK RUN DRIVE, SUITE 150 LAS VEGAS, NEVADA 89145 (702) 382-0200

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